

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States District Court
Southern District of Texas
FILED

MAR 24 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA §
§
v. §
§
ANGEL ALBERTO LOPEZ-RODRIGUEZ §
DIMAS DELEON-RIOS §
CARLOS AARON OYERVIDES §
CARMEN MEYER §
MARIO ALEJANDRO SOLIS §
FRANCISCO ARIZMENDIZ-LUGO §
JESUS ALEJANDRO MARTINEZ-LOPEZ §
MARTIN PEÑA §
RUBEN ANGEL NAVA-PEREZ §

Criminal No. 4:15-cr-0544-S1

FIRST SUPERSEDING
INDICTMENT

THE GRAND JURY CHARGES THAT:

Count One

(Conspiracy to Possess with Intent to Distribute Cocaine)

From on or about January 1, 2010 and continuing thereafter until September 10, 2015, in the Southern District of Texas and elsewhere, and within the jurisdiction of the Court, defendants

ANGEL ALBERTO LOPEZ-RODRIGUEZ
DIMAS DELEON-RIOS
CARLOS AARON OYERVIDES
CARMEN MEYER
MARIO ALEJANDRO SOLIS
FRANCISCO ARMENDARIZ-LUGO
JESUS ALEJANDRO MARTINEZ-LOPEZ
MARTIN PEÑA
and
RUBEN ANGEL NAVA-PEREZ

did knowingly and intentionally conspire and agree with each other and others known and unknown to the Grand Jury to knowingly and intentionally possess with intent to distribute a controlled substance. All the above-named defendants conspired to possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

Count Two

(Possession with Intent to Distribute Cocaine)

On or about June 14, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants

DIMAS DELEON-RIOS
and
CARLOS AARON OYERVIDES

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 69 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Three

(Possession with Intent to Distribute Cocaine)

On or about October 1, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants

DIMAS DELEON-RIOS
and
CARLOS AARON OYERVIDES

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 49 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Four

(Possession with Intent to Distribute Cocaine)

On or about February 27, 2013, in the Southern District of Texas and within the jurisdiction of the Court, defendants

MARTIN PEÑA
DIMAS DELEON-RIOS
and
CARLOS AARON OYERVIDES

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 26 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Five

(Possession with Intent to Distribute Cocaine)

On or about March 18, 2013, in the Southern District of Texas and within the jurisdiction of the Court, defendants

DIMAS DELEON-RIOS
CARMEN MEYER
MARIO ALEJANDRO SOLIS

FRANCISCO ARIZMENDIZ-LUGO
JESUS ALEJANDRO MARTINEZ-LOPEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 17 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Six
(Possession with Intent to Distribute Cocaine)

On or about March 24, 2013, in the Southern District of Texas and within the jurisdiction of the Court, defendants

DIMAS DELEON-RIOS
and
CARLOS AARON OYERVIDES

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 10 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Seven

(Possession with Intent to Distribute Cocaine)

On or about April 17, 2013, in the Southern District of Texas and within the jurisdiction of the Court, defendants

ANGEL ALBERTO LOPEZ-RODRIGUEZ
and
RUBEN ANGEL NAVA-PEREZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 10 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Eight

(Possession with Intent to Distribute Cocaine)

On or about April 20, 2013, in the Southern District of Texas and within the jurisdiction of the Court, defendants

DIMAS DELEON-RIOS
and
MARIO ALEJANDRO SOLIS

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 17 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Nine

(Possession with Intent to Distribute Cocaine)

On or about April 25, 2013, in the Southern District of Texas and within the jurisdiction of the Court, defendants

DIMAS DELEON-RIOS
CARLOS AARON OYERVIDES
CARMEN MEYER
FRANCISCO ARIZMENDIZ-LUGO
and
JESUS ALEJANDRO MARTINEZ-LOPEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 18 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Ten

(Possession with Intent to Distribute Cocaine)

On or about July 19, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant

ANGEL ALBERTO LOPEZ-RODRIGUEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is approximately 100 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Eleven

(Possession with Intent to Distribute Methamphetamine)

On or about September 10, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant

ANGEL ALBERTO LOPEZ-RODRIGUEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is approximately 1 kilogram, of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

Notice of Criminal Forfeiture

Pursuant to Title 21, United States Code, Section 853(a), the United States of America gives notice to defendants,

ANGEL ALBERTO LOPEZ-RODRIGUEZ
and
DIMAS DELEON-RIOS

that, in the event of conviction for the offense(s) charged herein, the defendants shall forfeit to the United States of America:

- 1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- 2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

The property to be forfeited includes, but is not limited to, approximately \$6,375,000.00.

Money Judgment

Defendants are notified that, upon conviction, the property subject to forfeiture includes, but is not limited to, a money judgment payable to the United States of America in an amount equal to the total value of the property subject to forfeiture. The amount of the money judgment is estimated to be, but is not limited to, approximately \$6,375,000.00.

Notice of Criminal Forfeiture

(Substitute Property)

If any of the property described above, as a result of any act or omission of any of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

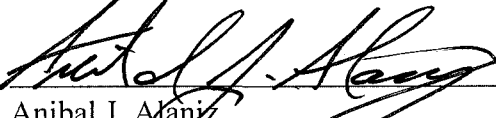
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 18, United States Code, Section 982(b)(1) incorporating Title 21, United States Code, Section 853(p).

A TRUE BILL

Original Signature on File

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY


Anibal J. Alaniz
Assistant United States Attorney